

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

-----X  
BRUCE RIGGS, Individually, and on Behalf of  
All Others Similarly Situated,

Plaintiff,

vs.

MASSACHUSETTS FINANCIAL SERVICES  
COMPANY, MFS INVESTMENT  
MANAGEMENT, SUN LIFE FINANCIAL, INC.,  
MFS SERIES TRUST I, MFS SERIES TRUST II,  
MFS SERIES TRUST III, MFS SERIES TRUST IV,  
MFS SERIES TRUST V, MFS SERIES TRUST VI,  
MFS SERIES TRUST VII, MFS SERIES TRUST  
VIII, MFS SERIES TRUST IX, MFS SERIES  
TRUST X, MFS SERIES TRUST XI, MFS  
CAPITAL OPPORTUNITIES FUND, MFS CORE  
GROWTH FUND, MFS LARGE CAP GROWTH  
FUND, MFS MANAGED SECTORS FUND, MFS  
MID CAP GROWTH FUND, MFS NEW  
DISCOVERY FUND, MFS NEW ENDEAVOR  
FUND, MFS RESEARCH FUND, MFS  
STRATEGIC GROWTH FUND, MFS  
TECHNOLOGY FUND, MASSACHUSETTS  
INVESTORS GROWTH STOCK, MFS MID CAP  
VALUE FUND, MFS RESEARCH GROWTH  
AND INCOME FUND, MFS TOTAL RETURN  
FUND, MFS UNION STANDARD EQUITY FUND,  
MFS UTILITIES FUND, MFS VALUE FUND,

Civ. No. 03 CV 12500 (WGY)

[Caption continued on next page]

**DECLARATION OF BRADLEY P. DYER IN SUPPORT OF THE MOTION OF THE  
BURRELL PROPOSED LEAD PLAINTIFFS FOR CONSOLIDATION, APPOINTMENT  
AS LEAD PLAINTIFFS AND APPROVAL OF SELECTION OF LEAD AND LIAISON  
COUNSEL**

MASSACHUSETTS INVESTORS TRUST, MFS  
AGGRESSIVE GROWTH ALLOCATION FUND,  
MFS CONSERVATIVE ALLOCATION FUND,  
MFS MODERATE ALLOCATION FUND, MFS  
BOND FUND, MFS EMERGING MARKETS  
DEBT FUND, MFS GOVERNMENTAL  
LIMITED MATURITY FUND, MFS  
GOVERNMENT MORTGAGE FUND, MFS  
GOVERNMENT SECURITIES FUND, MFS  
HIGH INCOME FUND, MFS HIGH YIELD  
OPPORTUNITIES FUND, BOND FUND, MFS  
LIMITED MATURITY FUND, MFS RESEARCH  
BOND FUND, MFS STRATEGIC INCOME FUND,  
MFS ALABAMA MUNICIPAL BOND FUND,  
MFS ARKANSAS MUNICIPAL BOND FUND,  
MFS CALIFORNIA MUNICIPAL BOND FUND,  
MFS FLORIDA MUNICIPAL BOND FUND, MFS  
GEORGIA MUNICIPAL BOND FUND, MFS  
MARYLAND MUNICIPAL BOND FUND, MFS  
MASSACHUSETTS MUNICIPAL BOND FUND,  
MFS MISSISSIPPI MUNICIPAL BOND FUND,  
MFS MUNICIPAL BOND FUND, MFS  
MUNICIPAL LIMITED MATURITY FUND,  
MFS NEW YORK MUNICIPAL BOND FUND,  
MFS NORTH CAROLINA MUNICIPAL BOND  
FUND, MFS PENNSYLVANIA MUNICIPAL  
BOND FUND, MFS SOUTH CAROLINA  
MUNICIPAL BOND FUND, MFS TENNESSEE  
MUNICIPAL BOND FUND, MFS VIRGINIA  
MUNICIPAL BOND FUND, MFS WEST  
VIRGINIA MUNICIPAL BOND FUND, MFS  
EMERGING MARKETS EQUITY FUND, MFS  
GLOBAL EQUITY FUND, MFS GLOBAL  
GROWTH FUND, MFS GLOBAL TOTAL  
RETURN FUND, MFS INTERNATIONAL  
GROWTH FUND, MFS INTERNATIONAL  
NEW DISCOVERY FUND, MFS  
INTERNATIONAL VALUE FUND, MFS  
RESEARCH INTERNATIONAL FUND, MFS  
SERIES TRUST VII and ALL DEFENDANTS,

Defendants.

[Additional Captions Set Forth Below]

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OLIVER S. TRONE, Individually, and on Behalf of  
All Others Similarly Situated,

Plaintiff,

vs.

Civ. No. 03 CV 12514 (WGY)

MFS CAPITAL OPPORTUNITIES FUND, MFS  
CORE GROWTH FUND, MFS LARGE CAP  
GROWTH FUND, MFS MANAGED SECTORS  
FUND, MFS MID CAP GROWTH FUND, MFS  
NEW DISCOVERY FUND, MFS NEW  
ENDEAVOR FUND, MFS RESEARCH FUND,  
MFS STRATEGIC GROWTH FUND, MFS  
TECHNOLOGY FUND, MASSACHUSETTS  
INVESTORS GROWTH STOCK, MFS MID CAP  
VALUE FUND, MFS RESEARCH GROWTH  
AND INCOME FUND, MFS TOTAL RETURN  
FUND, MFS UNION STANDARD EQUITY FUND,  
MFS UTILITIES FUND, MFS VALUE FUND,  
MASSACHUSETTS INVESTORS TRUST, MFS  
AGGRESSIVE GROWTH ALLOCATION FUND,  
MFS CONSERVATIVE ALLOCATION FUND,  
MFS MODERATE ALLOCATION FUND, MFS  
BOND FUND, MFS EMERGING MARKETS  
DEBT FUND, MFS GOVERNMENTAL  
LIMITED MATURITY FUND, MFS  
GOVERNMENT MORTGAGE FUND, MFS  
GOVERNMENT SECURITIES FUND, MFS  
HIGH INCOME FUND, MFS HIGH YIELD  
OPPORTUNITIES FUND, BOND FUND, MFS  
LIMITED MATURITY FUND, MFS RESEARCH  
BOND FUND, MFS STRATEGIC INCOME FUND,  
MFS ALABAMA MUNICIPAL BOND FUND,  
MFS ARKANSAS MUNICIPAL BOND FUND,  
MFS CALIFORNIA MUNICIPAL BOND FUND,  
MFS FLORIDA MUNICIPAL BOND FUND, MFS  
GEORGIA MUNICIPAL BOND FUND, MFS  
MARYLAND MUNICIPAL BOND FUND, MFS  
MASSACHUSETTS MUNICIPAL BOND FUND,  
MFS MISSISSIPPI MUNICIPAL BOND FUND,

MFS MUNICIPAL BOND FUND, MFS  
MUNICIPAL LIMITED MATURITY FUND,  
MFS NEW YORK MUNICIPAL BOND FUND,  
MFS NORTH CAROLINA MUNICIPAL BOND  
FUND, MFS PENNSYLVANIA MUNICIPAL  
BOND FUND, MFS SOUTH CAROLINA  
MUNICIPAL BOND FUND, MFS TENNESSEE  
MUNICIPAL BOND FUND, MFS VIRGINIA  
MUNICIPAL BOND FUND, MFS WEST  
VIRGINIA MUNICIPAL BOND FUND, MFS  
EMERGING MARKETS EQUITY FUND, MFS  
GLOBAL EQUITY FUND, MFS GLOBAL  
GROWTH FUND, MFS GLOBAL TOTAL  
RETURN FUND, MFS INTERNATIONAL  
GROWTH FUND, MFS INTERNATIONAL  
NEW DISCOVERY FUND, MFS  
INTERNATIONAL VALUE FUND, MFS  
RESEARCH INTERNATIONAL FUND, MFS  
CASH RESERVE FUND, MFS GOVERNMENT  
MONEY MARKET FUND, MFS MONEY  
MARKET FUND, MFS MUNICIPAL SERIES  
TRUST, MFS SERIES TRUST I, MFS SERIES  
TRUST II, MFS SERIES TRUST III, MFS SERIES  
TRUST IV, MFS SERIES TRUST V, MFS SERIES  
TRUST VI, MFS SERIES TRUST VII, MFS SERIES:  
TRUST VIII, MFS SERIES TRUST IX, MFS  
SERIES TRUST X, MFS SERIES TRUST XI, SUN  
LIFE FINANCIAL, INC., JOHN DOES 1-100, and  
ALL DEFENDANTS,  
  
Defendants.  
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DANIELLE ADAMS and  
DEAN DELLAVENTURA, Individually, and on  
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

MFS CAPITAL OPPORTUNITIES FUND, MFS  
CORE GROWTH FUND, MFS LARGE CAP  
GROWTH FUND, MFS MANAGED SECTORS  
FUND, MFS MID CAP GROWTH FUND, MFS  
NEW DISCOVERY FUND, MFS NEW  
ENDEAVOR FUND, MFS RESEARCH FUND,  
MFS STRATEGIC GROWTH FUND, MFS  
TECHNOLOGY FUND, MASSACHUSETTS  
INVESTORS GROWTH STOCK, MFS MID CAP  
VALUE FUND, MFS RESEARCH GROWTH  
AND INCOME FUND, MFS TOTAL RETURN  
FUND, MFS UNION STANDARD EQUITY FUND,  
MFS UTILITIES FUND, MFS VALUE FUND,  
MASSACHUSETTS INVESTORS TRUST, MFS  
AGGRESSIVE GROWTH ALLOCATION FUND,  
MFS CONSERVATIVE ALLOCATION FUND,  
MFS MODERATE ALLOCATION FUND, MFS  
BOND FUND, MFS EMERGING MARKETS  
DEBT FUND, MFS GOVERNMENTAL  
LIMITED MATURITY FUND, MFS  
GOVERNMENT MORTGAGE FUND, MFS  
GOVERNMENT SECURITIES FUND, MFS  
HIGH INCOME FUND, MFS HIGH YIELD  
OPPORTUNITIES FUND, BOND FUND, MFS  
LIMITED MATURITY FUND, MFS RESEARCH  
BOND FUND, MFS STRATEGIC INCOME FUND,  
MFS ALABAMA MUNICIPAL BOND FUND,  
MFS ARKANSAS MUNICIPAL BOND FUND,  
MFS CALIFORNIA MUNICIPAL BOND FUND,  
MFS FLORIDA MUNICIPAL BOND FUND, MFS  
GEORGIA MUNICIPAL BOND FUND, MFS  
MARYLAND MUNICIPAL BOND FUND, MFS

Civ. No. 03 CV 12536 (WGY)

MASSACHUSETTS MUNICIPAL BOND FUND, :  
MFS MISSISSIPPI MUNICIPAL BOND FUND, :  
MFS MUNICIPAL BOND FUND, MFS :  
MUNICIPAL LIMITED MATURITY FUND, :  
MFS NEW YORK MUNICIPAL BOND FUND, :  
MFS NORTH CAROLINA MUNICIPAL BOND :  
FUND, MFS PENNSYLVANIA MUNICIPAL :  
BOND FUND, MFS SOUTH CAROLINA :  
MUNICIPAL BOND FUND, MFS TENNESSEE :  
MUNICIPAL BOND FUND, MFS VIRGINIA :  
MUNICIPAL BOND FUND, MFS WEST :  
VIRGINIA MUNICIPAL BOND FUND, MFS :  
EMERGING MARKETS EQUITY FUND, MFS :  
GLOBAL EQUITY FUND, MFS GLOBAL :  
GROWTH FUND, MFS GLOBAL TOTAL :  
RETURN FUND, MFS INTERNATIONAL :  
GROWTH FUND, MFS INTERNATIONAL :  
NEW DISCOVERY FUND, MFS :  
INTERNATIONAL VALUE FUND, MFS :  
RESEARCH INTERNATIONAL FUND, MFS :  
CASH RESERVE FUND, MFS GOVERNMENT :  
MONEY MARKET FUND, MFS MONEY :  
MARKET FUND, MFS MUNICIPAL SERIES :  
TRUST, MFS SERIES TRUST I, MFS SERIES :  
TRUST II, MFS SERIES TRUST III, MFS SERIES :  
TRUST IV, MFS SERIES TRUST V, MFS SERIES :  
TRUST VI, MFS SERIES TRUST VII, MFS SERIES :  
TRUST VIII, MFS SERIES TRUST IX, MFS :  
SERIES TRUST X, MFS SERIES TRUST XI, SUN :  
LIFE FINANCIAL, INC., MASSACHUSETTS :  
FINANCIAL SERVICES COMPANY DBA MFS :  
INVESTMENT MANAGEMENT, and JOHN DOES :  
1-100 :

Defendants. :

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STEVEN GREENBERG, on Behalf of Himself and :  
All Others Similarly Situated, :  
 :  
Plaintiff, : Civ. No. 03 CV 12545 (WGY)  
 :  
vs. :  
 :  
MASSACHUSETTS FINANCIAL SERVICES :  
COMPANY, MFS SERIES TRUST I, MFS SERIES :  
TRUST II, MFS SERIES TRUST III, MFS SERIES :  
TRUST IV, MFS SERIES TRUST V, MFS SERIES :  
TRUST VI, MFS SERIES TRUST VII, MFS SERIES :  
TRUST VIII, MFS SERIES TRUST IX, MFS :  
SERIES TRUST X, and MFS SERIES TRUST XI, :  
 :  
Defendants. :  
 :  
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JACOB ELEPHANT, on Behalf of Himself and  
All Others Similarly Situated,

Plaintiff,

Civ. No. 03 CV 12570 (WGY)

vs.

MASSACHUSETTS FINANCIAL SERVICES  
COMPANY, MFS INVESTMENT  
MANAGEMENT, SUN LIFE FINANCIAL, INC.,  
MFS SERIES TRUST I, MFS SERIES TRUST II,  
MFS SERIES TRUST III, MFS SERIES TRUST IV,  
MFS SERIES TRUST V, MFS SERIES TRUST VI,  
MFS SERIES TRUST VII, MFS SERIES TRUST  
VIII, MFS SERIES TRUST IX, MFS SERIES  
TRUST X, MFS SERIES TRUST XI, MFS  
CAPITAL OPPORTUNITIES FUND, MFS CORE  
GROWTH FUND, MFS LARGE CAP GROWTH  
FUND, MFS MANAGED SECTORS FUND, MFS  
MID CAP GROWTH FUND, MFS NEW  
DISCOVERY FUND, MFS NEW ENDEAVOR  
FUND, MFS RESEARCH FUND, MFS  
STRATEGIC GROWTH FUND, MFS  
TECHNOLOGY FUND, MASSACHUSETTS  
INVESTORS GROWTH STOCK, MFS MID CAP  
VALUE FUND, MFS RESEARCH GROWTH  
AND INCOME FUND, MFS TOTAL RETURN  
FUND, MFS UNION STANDARD EQUITY FUND,  
MFS UTILITIES FUND, MFS VALUE FUND,  
MASSACHUSETTS INVESTORS TRUST, MFS  
AGGRESSIVE GROWTH ALLOCATION FUND,  
MFS CONSERVATIVE ALLOCATION FUND,  
MFS MODERATE ALLOCATION FUND, MFS  
BOND FUND, MFS EMERGING MARKETS  
DEBT FUND, MFS GOVERNMENTAL  
LIMITED MATURITY FUND, MFS  
GOVERNMENT MORTGAGE FUND, MFS  
GOVERNMENT SECURITIES FUND, MFS  
HIGH INCOME FUND, MFS HIGH YIELD  
OPPORTUNITIES FUND, BOND FUND, MFS  
LIMITED MATURITY FUND, MFS RESEARCH



BOND FUND, MFS STRATEGIC INCOME FUND, :  
MFS ALABAMA MUNICIPAL BOND FUND, :  
MFS ARKANSAS MUNICIPAL BOND FUND, :  
MFS CALIFORNIA MUNICIPAL BOND FUND, :  
MFS FLORIDA MUNICIPAL BOND FUND, MFS :  
GEORGIA MUNICIPAL BOND FUND, MFS :  
MARYLAND MUNICIPAL BOND FUND, MFS :  
MASSACHUSETTS MUNICIPAL BOND FUND, :  
MFS MISSISSIPPI MUNICIPAL BOND FUND, :  
MFS MUNICIPAL BOND FUND, MFS :  
MUNICIPAL LIMITED MATURITY FUND, :  
MFS NEW YORK MUNICIPAL BOND FUND, :  
MFS NORTH CAROLINA MUNICIPAL BOND :  
FUND, MFS PENNSYLVANIA MUNICIPAL :  
BOND FUND, MFS SOUTH CAROLINA :  
MUNICIPAL BOND FUND, MFS TENNESSEE :  
MUNICIPAL BOND FUND, MFS VIRGINIA :  
MUNICIPAL BOND FUND, MFS WEST :  
VIRGINIA MUNICIPAL BOND FUND, MFS :  
EMERGING MARKETS EQUITY FUND, MFS :  
GLOBAL EQUITY FUND, MFS GLOBAL :  
GROWTH FUND, MFS GLOBAL TOTAL :  
RETURN FUND, MFS INTERNATIONAL :  
GROWTH FUND, MFS INTERNATIONAL :  
NEW DISCOVERY FUND, MFS :  
INTERNATIONAL VALUE FUND, MFS :  
RESEARCH INTERNATIONAL FUND, JOHN :  
DOES 1-100, and MFS FUNDS :

Defendants. :

-----X

-----X  
YAKOV BURSTEIN, Individually and on Behalf of  
All Others Similarly Situated,

Plaintiff,

Civ. No. 03 CV 12622 (WGY)

vs.

MFS GLOBAL TELECOMMUNICATIONS FUND,  
CAPITAL OPPORTUNITIES FUND, MFS CORE  
GROWTH FUND, MFS LARGE CAP GROWTH  
FUND, MFS MANAGED SECTORS FUND, MFS  
MID CAP GROWTH FUND, MFS NEW  
DISCOVERY FUND, MFS NEW ENDEAVOR  
FUND, MFS RESEARCH FUND, MFS  
STRATEGIC GROWTH FUND, MFS  
TECHNOLOGY FUND, MASSACHUSETTS  
INVESTORS GROWTH STOCK, MFS MID CAP  
VALUE FUND, MFS RESEARCH GROWTH  
AND INCOME FUND, MFS TOTAL RETURN  
FUND, MFS UNION STANDARD EQUITY FUND,  
MFS UTILITIES FUND, MFS VALUE FUND,  
MASSACHUSETTS INVESTORS TRUST, MFS  
AGGRESSIVE GROWTH ALLOCATION FUND,  
MFS CONSERVATIVE ALLOCATION FUND,  
MFS MODERATE ALLOCATION FUND, MFS  
BOND FUND, MFS EMERGING MARKETS  
DEBT FUND, MFS GOVERNMENTAL  
LIMITED MATURITY FUND, MFS  
GOVERNMENT MORTGAGE FUND, MFS  
GOVERNMENT SECURITIES FUND, MFS  
HIGH INCOME FUND, MFS HIGH YIELD  
OPPORTUNITIES FUND, BOND FUND, MFS  
LIMITED MATURITY FUND, MFS RESEARCH  
BOND FUND, MFS STRATEGIC INCOME FUND,  
MFS ALABAMA MUNICIPAL BOND FUND,  
MFS ARKANSAS MUNICIPAL BOND FUND,  
MFS CALIFORNIA MUNICIPAL BOND FUND,  
MFS FLORIDA MUNICIPAL BOND FUND, MFS  
GEORGIA MUNICIPAL BOND FUND, MFS  
MARYLAND MUNICIPAL BOND FUND, MFS  
MASSACHUSETTS MUNICIPAL BOND FUND,

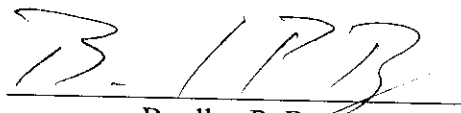
MFS MISSISSIPPI MUNICIPAL BOND FUND, :  
MFS MUNICIPAL BOND FUND, MFS :  
MUNICIPAL LIMITED MATURITY FUND, :  
MFS NEW YORK MUNICIPAL BOND FUND, :  
MFS NORTH CAROLINA MUNICIPAL BOND :  
FUND, MFS PENNSYLVANIA MUNICIPAL :  
BOND FUND, MFS SOUTH CAROLINA :  
MUNICIPAL BOND FUND, MFS TENNESSEE :  
MUNICIPAL BOND FUND, MFS VIRGINIA :  
MUNICIPAL BOND FUND, MFS WEST :  
VIRGINIA MUNICIPAL BOND FUND, MFS :  
EMERGING MARKETS EQUITY FUND, MFS :  
GLOBAL EQUITY FUND, MFS GLOBAL :  
GROWTH FUND, MFS GLOBAL TOTAL :  
RETURN FUND, MFS INTERNATIONAL :  
GROWTH FUND, MFS INTERNATIONAL :  
NEW DISCOVERY FUND, MFS :  
INTERNATIONAL VALUE FUND, MFS :  
RESEARCH INTERNATIONAL FUND, MFS :  
CASH RESERVE FUND, MFS GOVERNMENT :  
MONEY MARKET FUND, MFS :  
GOVERNMENT MONEY MARKET FUND, MFS :  
FUNDS, MFS MUNICIPAL SERIES TRUST, :  
MFS SERIES TRUST I, MFS SERIES TRUST II, :  
MFS SERIES TRUST III, MFS SERIES TRUST IV, :  
MFS SERIES TRUST V, MFS SERIES TRUST VII, :  
MFS SERIES TRUST VIII, MFS SERIES TRUST :  
IX, MFS SERIES TRUST X, MFS SERIES TRUST :  
XI, MFS FUND REGISTRANTS, SUN LIFE :  
FINANCIAL, INC., MASSACHUSETTS :  
FINANCIAL SERVICES COMPANY DBA MFS :  
INVESTMENT MANAGEMENT, JOHN DOES :  
1-100, MFS and SERIES TRUST VI, :  
: :  
Defendants. :  
-----X

BRADLEY P. DYER, being duly sworn, deposes and says:

1. I am an associate at the law firm of Stull, Stull & Brody. I respectfully submit this Declaration in Support of the Motion of the Burrell Proposed Lead Plaintiffs for (i) Consolidation; (2) Appointment as lead Plaintiffs; and (iii) Approval of their Choice of Counsel.

2. Attached hereto are true and correct copies of the following documents:

- A. December 11, 2003 Notice of a Class Action on behalf of MFS Mutual Fund purchasers, redeemers or holders, published over PR Newswire.
- B. Certifications executed by the Burrell Proposed Lead Plaintiffs demonstrating their class standing and requisite financial interest in the litigation;
- C. A chart summarizing the transactions of the Burrell Proposed Lead Plaintiffs during the Class Period;
- D. Firm Biography of Stull, Stull & Brody;
- E. Firm Biography of Weiss & Yourman; and
- F. Firm Biography of Gilman and Pastor, LLP

  
Bradley P. Dyer